

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

WORLDS.COM INC.,

Plaintiff,

v.

NCSOFT CORP.,

Defendant.

CASE NO. C 09-01982 MHP

**JOINT STIPULATION REGARDING
DISCOVERY PLAN**

Judge: Hon. Marilyn H. Patel
Courtroom 15, 18th Floor

Pursuant to the Court's guidance on December 7, 2009, Worlds.com, Inc. ("Worlds.com") and NCsoft Corporation ("NCsoft") submit the following stipulation regarding the following modifications to the joint Discovery Plan:

1. Worlds.com shall produce all documents called for by Patent L.R. 3-2, including all documents concerning conception/reduction to practice, by December 18, 2009.

2. NCsoft shall serve contentions and produce documents pursuant to Patent L.R. 3-3 and 3-4 by January 15, 2009.

3. The remaining discovery schedule shall be amended as follows:

Event	Original Date	Stipulated Date
Proposed Terms for Construction (Patent L.R. 4-1) due	December 18, 2009	January 22, 2010
Preliminary Claim Construction (Patent L.R. 4-2) due	January 15, 2010	February 19, 2010

Event	Original Date	Stipulated Date
Joint Claim Construction and claim construction expert reports (Patent L.R. 4-3) due	February 26, 2010	April 2, 2010
Last Day for discovery relating to Claim Construction (Patent L.R. 4-4)	April 5, 2010	May 10, 2010
Opening Claim Construction Brief (in compliance with Patent L.R. 4-5(a)) due	April 26, 2010	May 31, 2010
Opposing Claim Construction Brief(s) (in compliance with Patent L.R. 4-5(b)) due	May 14, 2010	June 18, 2010
Reply Claim Construction Brief(s) (in compliance with Patent L.R. 4-5(c)) due	May 25, 2010	June 29, 2010
Claim Construction Hearing (in compliance with Patent L.R. 4-6)	June 8, 2010, or at the Court's convenience	July 13, 2010, or at the Court's convenience
Last day to disclose reliance on advice of counsel	(50 days after <i>Markman</i> ruling)	(50 days after <i>Markman</i> ruling)
Close of Fact Discovery	(75 days after <i>Markman</i> ruling)	(75 days after <i>Markman</i> ruling)
Expert reports on issues for which a party bears the burden of proof	(4 weeks after close of fact discovery)	(4 weeks after close of fact discovery)
Rebuttal expert reports	(10 weeks after close of fact discovery)	(10 weeks after close of fact discovery)

Event	Original Date	Stipulated Date
Close of expert discovery	(14 weeks after close of fact discovery)	(14 weeks after close of fact discovery)
Last day to file dispositive motions	(16 weeks after close of fact discovery)	(16 weeks after close of fact discovery)
Pre-trial conference	(30 weeks after close of fact discovery, or at the Court's convenience)	(30 weeks after close of fact discovery, or at the Court's convenience)
Trial	(34 weeks after close of fact discovery, or at the Court's convenience)	(34 weeks after close of fact discovery, or at the Court's convenience)

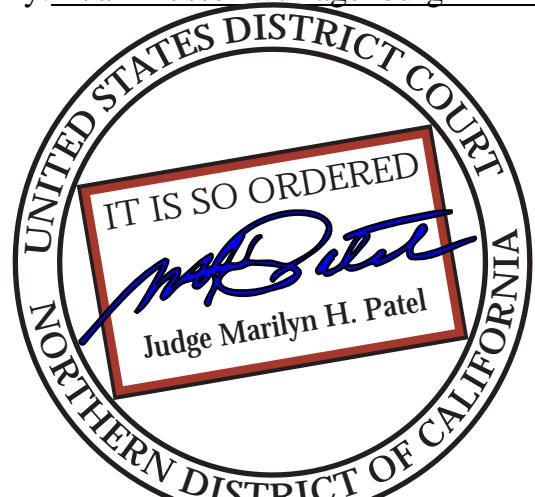
Dated: December 10, 2009

Respectfully submitted,

David Commins
 COMMINES & KNUDSEN, P.C.
 400 Montgomery St., Suite 200
 San Francisco, CA 94104
 Tel: 415.391.6490
 Fax: 415.391.6493
Attorneys for Plaintiff Worlds.com Inc.

Stephen F. Roth (*pro hac vice*)
 Russell W. Fagenburg (*pro hac vice*)
 Keir J. LoIacono (*pro hac vice*)
 LERNER, DAVID, LITTENBERG,
 KRUMHOLZ & MENTLIK, LLP
 600 South Avenue West
 Westfield, NJ 07090
 Tel: 908.654.5000
 Fax: 908.654.7866
Attorneys for Plaintiff Worlds.com Inc.

By: /s/ Russel W. Fagenburg.



1 Gabrielle E. Higgins (CSB # 163179)
2 ROPES & GRAY
3 1900 University Avenue, 6th Floor
4 East Palo Alto, CA 94303
5 Tel: 650.617.4015
6 Fax: 650.566.4131

7
8 *Attorneys for Defendant NCsoft Corp.*

Jesse J. Jenner (*pro hac vice*)
Gene W. Lee (*pro hac vice*)
David S. Chun (*pro hac vice*)
Brian P. Biddinger (CSB # 224604)
Hanyong Lee (*pro hac vice*)
ROPES & GRAY
1211 Avenue of the Americas
New York, NY 10036-8704
Tel: 212.596.9000
Fax: 212.596.9090

9
10 *Attorneys for Defendant NCsoft Corp.*

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
By: /s/ Brian P. Biddinger.